

EXHIBIT 3

Defendants' Categorical Privilege Log #3¹

	<i>Date Range²</i>	<i>Document Type(s)</i>	<i>Sender(s), Recipient(s), Copyee(s)³</i>	<i>Category Description</i>	<i>Privilege⁴</i>
1	4/7/19-8/19/19	Text messages and/or accompanying images/links	Gillian Spear, Tom Harvey, Esq., Laurent Drogin, Esq., Gillian Spear, Tiffany Chen, Sabrina Weeks-Brittan and Michael Kaplan	Communications exchanged between and among Canal's general legal counsel, its external legal counsel, various former or current Canal personnel and/or others	Attorney-client communication; attorney work product
2	8/19/19-11/11/19	Text messages and/or accompanying images/links	Tom Harvey, Esq., Michael Kaplan, Ernest Sanders, Sabrina Weeks-Brittan, Nellie Norden and Alexandra Winogora	Communications and documents exchanged between and among Canal's general counsel, various former or current Canal personnel and/or external consultants and others relating to federal or state court actions	Attorney-client communication; attorney work product
3	11/12/18	Text message exchange	Tom Harvey, Esq. and Michael Kaplan	Communications between Canal personnel and Canal's general legal counsel	Attorney-client communication; attorney work product
4	1/24/19	Text messages	Blank Rome legal counsel (Jennifer Lombardo, Esq. and/or Carolyn Krauss-Browne, Esq.) and Mr. De Niro	Communications exchanged between Mr. De Niro and legal counsel relating to family law matters	Attorney-client communication; attorney work product

¹ Pursuant to the Stipulation and Order Regarding Production of Electronically Stored Information ("ESI") (Dkt. No. 29), this privilege log does not include (a) internal communications within Traub Lieberman Straus & Shrewsberry LLP ("TLSS"), (b) communications between TLSS and (i) Defendant Robert De Niro, (ii) Sabrina Weeks-Brittan, Gillian Spear, and Michael Kaplan if they remain Canal personnel, and/or (iii) Tom Harvey, Esq.; or (c) materials created by TLSS as part of the investigation or litigation of this case.

² The dates identified herein are based on the technical capabilities of the ESI platform in use.

³ Please note that this column of information encompasses communications that may only involve two of the identified individuals, depending on the particular communication. In other words, not every single communication identified herein involves all of the individuals specified in this column.

⁴ Defendants expressly reserve, and do not waive, all rights to modify and supplement the proffered privilege justifications offered herein.